

IN THE CIRCUIT COURT FOR THE THIRTEENTH JUDICIAL CIRCUIT
LASALLE COUNTY, ILLINOIS

KEVIN ROY KRAMER
Petitioner,

and

JULIA C. EICKMEIER
Respondent.

No. 15 F 153

FILED
JUL 01 2016
LA SALLE COUNTY CLERK
THIRTEENTH JUDICIAL CIRCUIT OF ILLINOIS

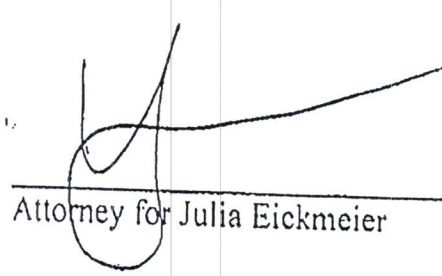
RESPONSE TO MOTION FOR RULE 215 EXAMINATION

NOW COMES the Respondent, by and through her attorney, Timothy F. Kohn, and responds as follows:

1. That there is pending a Motion for Modification of Custody/Parental Allocation Responsibilities before this Court.
2. That 750 ILCS 5/602.7 states that the mental health issues of all individuals is a factor in the determination of the child's best interests under 750 ILCS 5/602.7(7).
3. Thus, according to the Petitioner's reading of Supreme Court Rule 215, not only should Julia C. Eickmeier submit to a mental examination, but also Kevin Roy Kramer and the minor child should also submit to the same mental examination.
4. The court in Thompson v. Palos Community Hospital, 194 Ill Dec 123, 627 NE2d 239 (Ill App 1st, 1993), addresses Supreme Court Rule 215 and states that the, "Party moving for the physical examination of adverse party bears the initial burden of establishing good cause for examination." The court continues by stating that, "mere conclusory statement by defendant's counsel fails to demonstrate good cause to satisfy rule allowing physical examination of party upon showing of good cause."
5. In the case at the bar, the petition has not shown any cause, much less good cause. Petitioner seems to believe that a medical examination can be ordered in any parental allocation responsibilities case. *Thompson* indicates that more is needed. The petitioner has had met his initial burden of establishing good cause for any examination.

WHEREFORE, the Respondent prays for the following relief:

- A. That Petitioner's Petition for Rule 215 Examination be denied.
- B. Any and all relief this Court deems just.

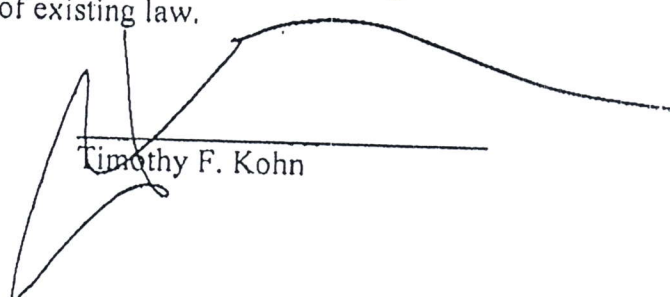


Attorney for Julia Eickmeier

CERTIFICATION OF ATTORNEY

STATE OF ILLINOIS)
) SS.
COUNTY OF LASALLE)

In accordance with Illinois Supreme Court Rule 137, I hereby certify that I have read this pleading and that to the best of my knowledge, information, and belief formed after reasonable inquiry, it is well grounded in fact and warranted by existing law or a good faith extension, modification or reversal of existing law.



Timothy F. Kohn

This document prepared by:

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